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Attorneys for Defendant
Mr. Vasquez

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:21-CR-175-KJM
Plaintiff,)
vs.) STIPULATION AND ORDER TO CONTINUE
VINCENT JOSE VASQUEZ,) STATUS HEARING AND EXCLUDE TIME
Defendant.)
) Date: January 10, 2022
) Time: 9:00 a.m.
) Judge: Kimberley J. Mueller

IT IS HEREBY STIPULATED and agreed by and between United States Attorney Phillip A. Talbert, through Assistant United States Attorney David Spencer, counsel for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmoammadi, counsel for Defendant Vincent Jose Vasquez, that the previously scheduled Status Hearing set for January 10, 2022 be continued to April 4, 2022 at 9:00 a.m.

The parties specifically stipulate as follows:

1. By previous order, the Status Hearing is currently scheduled for January 10, 2022 at 9:00 a.m. Time has been ordered excluded through that date.
2. Mr. Vasquez respectfully requests that the Court continue the Status Hearing to April 4, 2022 at 9:00 a.m. The government has produced 72 pages of discovery and two cellular telephone extractions to Mr. Vasquez. The parties have been in active plea negotiations. Defense counsel is scheduled for a murder trial in

another case in Oklahoma in the second half of March 2022. Mr. Vasquez requires additional time to review the discovery; investigate and research possible defenses; research potential pretrial motions; explore potential resolutions to the case; and otherwise prepare for trial.

3. Mr. Vasquez believes that failure to grant his motion would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

4. The government does not object to Mr. Vasquez's motion.

5. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), the parties request that the time period between January 10, 2022 and April 4, 2022, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance granted by the Court at the defense's request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public and Mr. Vasquez in a speedy trial.

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: January 3, 2022

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Defendant
Mr. Vasquez

Date: January 3, 2022

PHILLIP A. TALBERT
United States Attorney

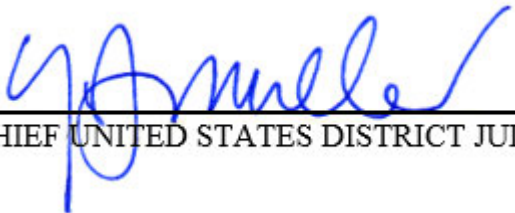
/s/ David Spencer
DAVID SPENCER
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

DATED: January 4, 2022.


CHIEF UNITED STATES DISTRICT JUDGE